

FILED 25 OCT '18 12:09 PM DCRP

**UNDER  
SEAL**

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

3:18-cr- 00504-HZ

**v.**

**INDICTMENT**

**BRIJESH SHARDUL SHAH,**

**18 U.S.C. §§ 2251(a) and (e);  
2252A(a)(2) and (b)(1); 2422(b); and  
2261A(2)**

**Defendant.**

**Forfeiture Allegations**

**UNDER SEAL**

**THE GRAND JURY CHARGES:**

**COUNT 1  
(Production of Child Pornography)  
(18 U.S.C. §§ 2251(a) and (e))**

From on or about February 1, 2014, through on or about December 8, 2016, in the District of Oregon and elsewhere, defendant **BRIJESH SHARDUL SHAH** knowingly and unlawfully employed, used, persuaded, induced, enticed, and coerced "MV1," a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of said conduct, and did attempt to do so, said depictions having been produced using materials that had been mailed, shipped or transported in or affecting interstate or foreign commerce by any means, including by a computer, and defendant knew or had reason to know said visual depictions would be shipped

**Indictment**

and transported in interstate and foreign commerce, and were in fact shipped and transported in interstate and foreign commerce by any means including by a computer;

In violation of Title 18, United States Code, Sections 2251(a) and (c).

**COUNT 2**  
**(Receiving Child Pornography)**  
**(18 U.S.C. §§ 2252A(a)(2) and (b)(1))**

From on or about February 1, 2014, through on or about December 8, 2016, in the District of Oregon and elsewhere, defendant **BRIJESH SHARDUL SHAH** knowingly and unlawfully received child pornography that had been shipped or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

**COUNT 3**  
**(Online Enticement)**  
**(18 U.S.C. § 2422(b))**

From on or about February 1, 2014, through on or about December 8, 2016, in the District of Oregon and elsewhere, defendant **BRIJESH SHARDUL SHAH** knowingly and unlawfully used and attempted to use a means of interstate commerce, namely the Internet, to attempt to persuade, induce, entice, and coerce "MV1, an individual who he believed had not attained the age of 18 years, to engage in sexual activity for which said defendant could be charged with a criminal offense, namely Using a Child in a Display of Sexually Explicit Conduct, in violation of ORS 163.670, and Production of Child Pornography, in violation of Title 18 United States Code Sections 2251(a) and (c);

In violation of Title 18, United States Code, Section 2422(b).

**COUNT 4**  
**(Cyberstalking)**  
**(18 U.S.C. § 2261A(2))**

From on or about February 1, 2014, through on or about December 8, 2016, in the District of Oregon and elsewhere, defendant **BRIJESH SHARDUL SHAH**, with the intent to harass, and intimidate another person, namely MV1, in another state, namely, Oregon, used an electronic communication system or any other facility of interstate or foreign commerce, including electronic mail, social media internet sites, and internet-based communications, to engage in a course of conduct that caused substantial emotional distress to MV1 and placed MV1 in reasonable fear of death or serious bodily injury to MV1 and the MV1's immediate family member;

In violation of Title 18, United States Code, Sections 2261A(2).

**FIRST FORFEITURE ALLEGATION**

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense described in Counts 1 and 2 of this indictment, defendant **BRIJESH SHARDUL SHAH** shall forfeit to the United States any and all matter which contain visual depictions of minors engaged in sexually explicit conduct that were produced, distributed, received, or possessed in violation thereof, and any and all property that was used or intended to be used in any manner or part to commit or to promote the commission of the aforementioned violations, including without limitation:

1. One Samsung Galaxy Edge cell phone.
2. One Acer Laptop computer Aspire.

**SECOND FORFEITURE ALLEGATION**

Pursuant to Title 18, United States Code, Section 2428, upon conviction of the offense alleged in Count 3 of this indictment, defendant **BRIJESH SHARDUL SHAH** shall forfeit to the United States any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of the offense alleged in that count, and any property, real or personal, constituting or derived from any proceeds obtained directly as a result of that offense, including without limitation:

1. One Samsung Galaxy Edge cell phone.
2. One Acer Laptop computer Aspire.

Dated: October 25, 2018

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS  
United States Attorney

A handwritten signature in black ink, appearing to read "P. T. Maloney", written over a horizontal line.

PAUL T. MALONEY, OSB#103366  
Assistant United States Attorney